

RABINOVICH SOKOLOV LAW GROUP LLC

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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHG COMPANIES, INC. d/b/a
COMPHEALTH, a Delaware corporation,

Plaintiff,

vs.

CKHS, INC., f/k/a/ CROZER-KEYSTONE
HEALTH SYSTEM, a Pennsylvania
corporation,

Defendant.

Civil Action No. 2:24-cv-00892-MAK

**AFFIDAVIT IN SUPPORT OF PLAINTIFF'S RULE 55(b)(1)
REQUEST FOR ENTRY OF DEFAULT JUDGMENT**

I, Jason L. Rabinovich, Esquire, being duly sworn under oath, state as follows:

1. I am the attorney for the Plaintiff in the above-entitled action and I am familiar with the file, records, and pleadings in this matter.
2. The Complaint was filed on February 29, 2024 (ECF 1), and the Summons was issued on March 1, 2024 (ECF 4).
3. Plaintiff's First Amended Verified Complaint was filed on March 1, 2024 (ECF 6).
4. On March 6, 2024, Defendant CKHS, INC., was served with a copy of the Summons and Plaintiff's First Amended Verified Complaint, as reflected on the docket by the Affidavit of Service filed on March 12, 2024 (ECF 7).

5. Defendant is not a minor, incompetent person, or person in the military.
6. On April 1, 2024, the Court issued a letter on the docket (ECF 8) stating in relevant part that if Defendant does not file a responsive pleading to Plaintiff's First Amended Complaint on or before April 15, 2024, then Plaintiff "may file a request with the clerk for entry of a default in accordance with Rule 55 of the Federal Rules of Civil Procedure."
7. In accordance with this Court's letter and the federal rules of civil procedure, Defendant's Answer to Plaintiff's First Amended Complaint was due on or before April 15, 2024.
8. Defendant failed to appear, plead, or otherwise defend with the time allowed; and, therefore, is now in default.
9. Plaintiff sued Defendant for breach of contract (Count I), breach of good faith and fair dealing (Count II), and unjust enrichment, in the alternative (Count III).
10. Plaintiff's damages against Defendant are readily ascertainable by the language of Plaintiff's First Amended Complaint and exhibits attached thereto, showing that the damages are \$652,886.29 plus pre- and post judgment interest. *See* Paragraph 28 of Plaintiff's First Amended Complaint.
11. As alleged in paragraph 28 of Plaintiff's First Amended Complaint, the amount owed by Defendant to Plaintiff has been past due since November 13, 2023.
12. Defendant continues to fail to satisfy its debt to Plaintiff.
13. Plaintiff respectfully requests that the Clerk of Court enter default judgment in favor of Plaintiff and against Defendant.
14. Plaintiff respectfully requests that the Court enter default judgment in favor of Plaintiff and against Defendant in the amount of \$652,886.29 plus pre-judgment interest at the rate

of 6% per year from November 13, 2023 until the date the judgment is entered, and post judgment interest at the rate of 6% per year from the date the judgment is entered until the date the judgment is satisfied by Defendant.

DATED: April 16, 2024

RESPECTFULLY SUBMITTED,
Rabinovich Sokolov Law Group LLC

A handwritten signature in black ink, appearing to read 'J. Rabinovich', is positioned above a horizontal line.

BY:

Jason L Rabinovich, Esquire
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I did cause a true and correct copy of Plaintiff's Request for Entry of Default Judgment, Affidavit in Support of Entry of Default Judgment, and proposed Default Judgment to be sent to Defendant via US First Class Mail, on or about the date indicated below, as follows:

CKHS, INC., f/k/a/ CROZER-KEYSTONE HEALTH SYSTEM
1 Medical Center Boulevard
Upland, PA 19013-3988

Rabinovich Sokolov Law Group LLC

BY: /s/ Jason Rabinovich

Jason Rabinovich, Esquire

Attorney for Plaintiff

Dated: April 16, 2024